

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON WAVE 8 CASES LISTED IN  
EXHIBIT A OF PLAINTIFFS' NOTICE OF  
ADOPTION

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT REPLY OF  
JULIE DROLET, M.D. FOR WAVE 8**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert reply filed against Sarah Abbie Collins, M.D. for Ethicon Wave 1, Dkt. 2254, and Wave 4, Dkt. 3861. Plaintiffs respectfully request that the Court grant Plaintiffs' motion, for the reasons expressed in the Wave 1 and Wave 4 briefing.

Dated: October 29, 2018

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
D. RENEE BAGGETT  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[Rbaggett@awkolaw.com](mailto:Rbaggett@awkolaw.com)